

FILED

Jun 22 2020

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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

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8 Attorneys for United States of America

9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,) CASE NO. CR20-249 RS

14 Plaintiff,)

15 v.)

16 ROWLAND MARCUS ANDRADE,)

17 Defendant.)

18) [REDACTED]

19)

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21 The United States hereby moves the Court for an order sealing the Indictment, the Arrest
22 Warrant, this Motion, and the Sealing Order until the arrest of the defendant on the Arrest Warrant
23 issued in this matter or until further order of the Court. Disclosure of the existence of the Indictment and
24 Arrest Warrant may cause the subject of the Indictment to flee, transfer funds or dissipate assets, destroy
25 evidence, or conceal on-going criminal activity, jeopardizing the progress of the ongoing investigation
26 and the arrest of the defendants. The United States also requests that a copy of the Indictment and
27 Arrest Warrant be provided to agents of the Federal Bureau of Investigation, agents of the Internal
28 Revenue Service-Criminal Investigation, and employees and contractors of the United States Attorney's

MOTION TO SEAL INDICTMENT
AND [PROPOSED ORDER]

1 Office, and that the Indictment and Arrest Warrant may be disclosed to federal agents and other law
2 enforcement officers in order to effectuate the arrest of the defendant.

3 DATED: June 18, 2020

Respectfully submitted,

4 DAVID L. ANDERSON
United States Attorney

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7 LLOYD FARNHAM
Assistant United States Attorney

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10 [PROPOSED] ORDER

11 Based upon the motion of the government and for good cause shown, IT IS HEREBY
12 ORDERED that the Indictment, Arrest Warrant, the Motion to Seal, this Sealing Order, and other related
13 documents in this case shall be sealed until the arrest of the defendant on the Arrest Warrant issued in
14 this matter or until further order of the Court. A copy of the Indictment and Arrest Warrant shall be
15 provided to agents of the Federal Bureau of Investigation, Internal Revenue Service-Criminal
16 Investigation, and employees and contractors of the United States Attorney's Office, and the Indictment
17 and Arrest Warrant may be disclosed to federal agents and other law enforcement officers in order to
18 effectuate the arrest of the defendant.

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21 DATED: June 18, 2020


22 HON. VIRGINIA K. DEMARCHE
United States Magistrate Judge